

EXHIBIT 3

DEPOSITION NOTICE OF KELLIE D. LOWREY, RN

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION	MDL No. 2419 Master Dkt. 1:13-md-02419-RWZ
THIS DOCUMENT RELATES TO:	
All Actions	

DEPOSITION NOTICE

Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure and MDL Order No. 10 (Document #1426), the Plaintiffs' Steering Committee ("PSC") will take the deposition of Kellie D. Lowrey, RN on Monday, March 28, 2016 beginning at 10:30 a.m., at the offices of Rainey, Kizer, Reviere & Bell 50 N. Front Street, Raymond James Tower, Suite 610 Memphis, TN 38103 The deposition will be recorded by stenographical means and by video. A request for records is attached as Exhibit A hereto.

Dated: March 16, 2016

Respectfully submitted,

/s/ Benjamin A. Gastel

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Chair*

CERTIFICATE OF SERVICE

I, Benjamin A. Gastel, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: March 16, 2016

/s/ Benjamin A. Gastel

Benjamin A. Gastel

EXHIBIT A

The word “documents” shall be defined to include any kind of written, typewritten, printed or recorded material whatsoever, including without limitation, statements, notes, transcription of notes, memoranda, letters, telefaxes, publications, agreements, pictures, photographs, audio tape recordings, video tape recordings, cassettes, transcriptions of any such recordings, log books, business records, and computer files or electronic data such as e-mails or instant messages.

Pursuant to the Federal Rules of Civil Procedure, this will serve as a request for the Deponent, expert witness Kellie D. Lowrey, RN, to produce the following documents at least seven days before her deposition:

1. All documents containing facts or data that she considered in forming his expert opinions.
2. All documents containing facts or data that the underlying party’s attorney provided to him and that she considered in forming the opinions to be expressed.
3. Copies of all scholarly literature on which she relied.
4. All exhibits that she intends to use to summarize or support her opinions.
5. All materials relevant to her opinions and her expert report in this case.
6. A list of all publications she authored in the previous 10 years.
7. A list of all other cases in which she has testified as an expert at trial or by deposition within the previous 4 years.
8. All communications relating to compensation for her study or testimony.
9. All non-privileged communications relating to her report.
10. Her current resume and curriculum vitae.